

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

21 Civ. 6995 (PKC)

THEIA GROUP, INC., d/b/a “THORIAN  
GROUP” and/or “CYPHERIAN”; THEIA  
AVIATION, LLC; and THEIA HOLDINGS A,  
INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

**DECLARATION OF MICHAEL FUQUA, AS RECEIVER, IN SUPPORT OF  
EXPEDITED MOTION OF RECEIVER FOR BRIDGE ORDER FURTHER  
EXTENDING THE STAY PROVIDED IN THE RECEIVERSHIP ORDER  
PENDING THE COURT’S RULING ON THE RECEIVER’S SALE MOTION**

I, Michael Fuqua, hereby declare as follows:

1. On November 8, 2021, the United States District Court for the Southern District of New York (this “Court”)<sup>1</sup> entered an *Order Appointing Michael Fuqua as Receiver* (Doc. 117) in the above-captioned case. Accordingly, I am the Court-appointed receiver for Theia Group, Inc., Theia Aviation LLC, and Theia Holdings A, Inc.

2. I submit this declaration (this “Declaration”) in support of the *Motion of Michael Fuqua, as Receiver, for Bridge Order Further Extending the Stay Provided in the Receivership Order Pending the Court’s Ruling on the Receiver’s Sale Motion* (the “Motion”) filed contemporaneously herewith.

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<sup>1</sup> Capitalized terms used but not defined here shall have the meanings given to such terms in the Motion or the *Memorandum of Law* in support thereof, as the context requires.

3. Except as otherwise noted, I have personal knowledge of the matters set forth herein. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

4. The factual averments set forth in the Motion and the *Memorandum of Law* in support thereof are true and correct.

5. I respectfully request that all of the relief requested in the Motion be granted, together with such other relief as is appropriate

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: August 23, 2023

By: /s/ Michael Fuqua  
Michael Fuqua